

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

In Re:

**EDGARDO J FIGUEROA AYALA
LYDIA I TORRES REYES**

Debtor(s)

Case No.: 09-09714 S

Chapter 13

MOTION TO INFORM AMENDED PLAN

TO THE HONORABLE COURT:

NOW COMES the debtor, through the undersigned attorney, and very respectfully alleges and prays:

1. That today the debtor is filing an amended chapter 13 repayment plan.
2. That the reason for amendment is to surrender shares with Coop. A/C Hermanos Unidos and provide direct payments to "DSO" recipient and increase the base of the plan.

WHEREFORE, the Trustee respectfully requests this Honorable Court to take notice of the aforementioned.

RESPECTFULLY SUBMITTED.

I HEREBY CERTIFY that a true and exact copy of the foregoing motion has been filed electronically with the Clerk of the Court using CM/ECF systems which will send notification of such to the Chapter 13 Trustee, and we sent copy of this document through regular mail to debtor (s) and all non CM/ECF participants interested parties to their addresses listed on the master address list.

In San Juan, Puerto Rico this 10th day of May of 2010.

JPC LAW OFFICE

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By: /s/ Jose M Prieto Carballo, Esq.

**United States Bankruptcy Court
District of Puerto Rico**

IN RE:

Case No. 09-09714-13

FIGUEROA AYALA, EDGARDO J & TORRES REYES, LYDIA I

Chapter 13

Debtor(s)

AMENDED CHAPTER 13 PAYMENT PLAN

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee ☒ directly ☐ by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: _____

☐ PRE ☐ POST-CONFIRMATION

☒ AMENDED PLAN DATED: 5/10/2010

Filed by: ☒ Debtor ☐ Trustee ☐ Other

I. PAYMENT PLAN SCHEDULE

\$ 600.00 x 2 = \$ 1,200.00
\$ 475.00 x 4 = \$ 1,900.00
\$ 485.00 x 54 = \$ 26,190.00
\$ _____ x _____ = \$ _____
\$ _____ x _____ = \$ _____

TOTAL: \$ 29,290.00

Additional Payments:

\$ _____ to be paid as a LUMP SUM
within _____ with proceeds to come from:

☐ Sale of Property identified as follows:

☐ Other:

Periodic Payments to be made other than, and in
addition to the above:

\$ _____ x _____ = \$ _____

PROPOSED BASE: \$ 29,290.00

**III. ATTORNEY'S FEES
(Treated as § 507 Priorities)**

Outstanding balance as per Rule 2016(b) Fee
Disclosure Statement: \$ 2,324.00

Signed: /s/ EDGARDO J FIGUEROA AYALA
Debtor

/s/ LYDIA I TORRES REYES
Joint Debtor

II. DISBURSEMENT SCHEDULE

A. ADEQUATE PROTECTION PAYMENTS OR \$ _____

B. SECURED CLAIMS:

☐ Debtor represents no secured claims.

☒ Creditors having secured claims will retain their liens and shall be paid as follows:

1. ☒ Trustee pays secured ARREARS:

Cr. BANCO POPULAR DE PR Cr. _____ Cr. _____
8773484 # _____ # _____
\$ 17,078.00 \$ _____ \$ _____

2. ☐ Trustee pays IN FULL Secured Claims:

Cr. _____ Cr. _____ Cr. _____
_____ # _____ # _____
\$ _____ \$ _____ \$ _____

3. ☐ Trustee pays VALUE OF COLLATERAL:

Cr. _____ Cr. _____ Cr. _____
_____ # _____ # _____
\$ _____ \$ _____ \$ _____

4. ☐ Debtor SURRENDERS COLLATERAL to Lien Holder:

5. ☐ Other:

6. ☒ Debtor otherwise maintains regular payments directly to:

BANCO POPULAR DE PR

C. PRIORITIES: The Trustee shall pay priorities in accordance with the law.
11 U.S.C. § 507 and § 1322(a)(2)

D. UNSECURED CLAIMS: Plan ☒ Classifies ☐ Does not Classify Claims.

1. (a) Class A: ☒ Co-debtor Claims / ☐ Other: _____
☐ Paid 100% / ☐ Other: _____

Cr. CITI FINANCIAL Cr. _____ Cr. _____
5001100150615 # _____ # _____
\$ 6,983.68 \$ _____ \$ _____

2. Unsecured Claims otherwise receive PRO-RATA disbursements.

OTHER PROVISIONS: (Executory contracts; payment of interest to unsecureds, etc.)
ATTORNEY FEES TO BE PAID FIRST.

LIFT OF STAY IN FAVOR OF BAXTER CREDIT UNION.

DEBTOR REJECTS LEASES WITH BANCO POPULAR (POWER GENERATOR) & FIRST LEASING
(2008 FORD EXPEDITION)

DEBTOR TO MAINTAIN DIRECT PAYMENT TO DSO RECIPIENT.

DEBTOR SURRENDERS SHARES WITH COOP/ HERMANOS UNIDOS.

Attorney for Debtor Jose Prieto

Phone: (787) 607-2066

AMENDED CHAPTER 13 PAYMENT PLAN
Continuation Sheet - Page 1 of 1

Cr

#

\$

Executory Contracts - Rejected:

FIRST LEASING
POPULAR AUTO

Label Matrix for local noticing
0104-3
Case 09-09714-ESL13
District of Puerto Rico
Old San Juan
Wed Mar 3 12:25:15 AST 2010

POPULAR AUTO
EDGAR A VEGA RIVERA
PO BOX 366818
SAN JUAN, PR 00936-6818

A&J COLLECTION
P O BOX 1010
CAMUY, PR 00627-1010

BANCO POPULAR DE PR
BANKRUPTCY DEPARTMENT
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SAN JUAN PUERTO RICO 00936-6818

BANCO SANTANDER
P O BOX 191080
SAN JUAN, PR 00919-1080

CAPITAL ONE
P O BOX 25131
RICHMOND, VA 23276-0001

CitiFinancial Inc
P O Box 70919
Charlotte NC 28272-0919

FIRST BANK
BANKRUPTCY DIVISION
PO BOX 9146
SAN JUAN P.R.00908-0146

GLORIA MENDOZA
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PASEO LAS OLA
TOA BAJA, PR 00949

LUIS MALAVET
#369 CALLE SABALO
PASEO LAS OLAS
TOA BAJA, PR 00949

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SAN JUAN, PR 00936-2159

AMERICAN EXPRESS
P O BOX 1270
NEWARK, NJ 07101-1270

BANCO POPULAR DE PR
P O BOX 362708
SAN JUAN, PR 00936-2708

BANCO SANTANDER-PUERTO RICO
PO BOX 362589
SAN JUAN PR 00936-2589

CITI FINANCIAL
P O BOX 73198
SAN JUAN, PR 00936

DORAL BANK
P O BOX 13988
SAN JUAN, PR 00908

FIRST BANK
P O BOX 9146
SAN JUAN, PR 00908-0146

IDALIA LLORENS COLLECTION AGENCY
P O BOX 362211
SAN JUAN, PR 00936-2211

POPULAR AUTO
P O BOX 50045
SAN JUAN, PR 00902

BANCO SANTANDER-PUERTO RICO
BANCO POPULAR CENTER, SUITE 1133
209 MUNOZ RIVERA AVE.
SAN JUAN, PR 00918-1000

US Bankruptcy Court District of P.R.
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San Juan, PR 00901-1964

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Malvern PA 19355-0701

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COOPERATIVA A/C HERMANOS UNIDOS
P O BOX 195245
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FIA Card Services NA aka Bank of America
by PRA Receivables Management, LLC
PO Box 12907
Norfolk VA 23541-0907

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500 TANCA STREET SUITE 301
SAN JUAN, PR 00901-1938

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)FIRST LEASING & CAR RENTAL

End of Label Matrix	
Mailable recipients	38
Bypassed recipients	1
Total	39